

**REMARKS**

Reconsideration and allowance of the above-identified application are respectfully requested.

Claims 1-18 are pending, wherein claims 1, 3, 10, 12, 15, and 18 are independent. Claims 1, 3, 10, 12, 15, and 18 have been amended. Specifically, each of claims 1, 3, 10, 12, 15, and 18 has been amended to recite that the EMI shield member has a substantially flat shape, wherein the EMI shield member does not include sidewalls along a perimeter of the EMI shield member. Support for these amendments can be found by reference to each of Figures 1-10. Therefore, no new matter has been added by these amendments.

Claims 1, 3, 6, and 10-18 have been rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,144,557 to Chen et al. Claims 1, 3, 4, and 6-18 have been rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 6,051,781 to Bianca et al. Claims 2, 4, and 5 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chen et al. These rejections are respectfully traversed.

As amended, independent claim 1 recites an EMI shielding structure, including a printed circuit having at least one contact protuberance, and an EMI shield member formed with an aperture receiving the contact protuberance. The EMI shield member is configured to be substantially parallel to the printed circuit, and the EMI shield member has a substantially flat shape, wherein the EMI shield member does not include sidewalls along its own perimeter. The EMI shield member has a contact wall defining the aperture. The aperture defining contact wall is in contact with the contact protuberance received in the aperture. The

contact protuberance is dimensioned such that the contact protuberance supports the EMI shield member.

Chen et al. is directed to a self-locking conductive pin for a printed wiring substrate electronics case. As indicated at Page 2 of the Office Action, Chen et al. discloses a printed circuit board (120, 140) having at least one protuberance (ground connection pin 130), a shield member (110) made of metal, and an aperture (112). However, in contrast to independent claim 1, the shield member 110 includes a top surface and sidewalls, as clearly shown in Figure 1 of Chen et al. The purpose of the sidewalls is to provide support for the top surface, and to provide some distance between the top surface and the printed circuit board, so that they do not collapse into one another. The sidewall structure of Chen et al. is consistent with the fact that Chen et al. is directed to an electronics case, and not an improved EMI shield as provided in the present invention. The electronics case of Chen et al. is intended as a physical enclosure for an electronics unit, whereas the EMI shielding structure of the present invention is intended to improve the efficiency of EMI shielding. For example, the present invention improves EMI shielding performance by reducing the elevation of the EMI shield member with respect to the printed circuit board, as discussed at page 7, line 31 through page 8, line 5 of the specification. As another example, the present invention improves EMI shielding performance by reducing the electric resistance between the contact protuberance and the EMI shield member, as discussed at page 7, lines 2-18 of the specification.

Furthermore, in the present invention, the contact protuberance is dimensioned such that the contact protuberance supports the EMI shield member, as recited in independent

claim 1. By contrast, the ground connection pin 130 of Chen et al. does not support the shield member 110. Instead, the sidewalls of the shield member 110 itself support the shield member 110, and the ground connection pin 130 of Chen et al. functions as a heat sink mount for the case and a case ground pin for the substrate (see column 4, lines 13-21). It also functions to fasten the shield member to the substrate. However, it does not support the shield member.

Because the EMI shielding structure of independent claim 1 includes an EMI shield member that has a substantially flat shape and that does not include sidewalls along its own perimeter, unlike the EMI shield member of Chen et al., Applicant submits that independent claim 1 is not anticipated by Chen et al. for at least this reason. In addition, because the contact protuberance of independent claim 1 supports the EMI shield member, unlike the ground connection pin of Chen et al., Applicant submits that independent claim 1 is not anticipated by Chen et al. for at least this reason.

Bianca et al. is directed to a surface mount electromagnetic frequency interference shield clip. As indicated at Page 2 of the Office Action, Bianca et al. discloses a printed circuit board (26) having at least one protuberance (10), a shield member (38) and an aperture (24). However, in contrast to independent claim 1, the shield member 38 includes a top surface and sidewalls 20, as clearly shown in Figure 2 of Bianca et al. The purpose of the sidewalls is to provide support for the top surface, and to provide some distance between the top surface and the printed circuit board, so that they do not collapse into one another. The sidewalls 20 also serve as the location of the apertures 24. The sidewall structure of Bianca et al. is consistent with the fact that Bianca et al. is directed to a clip fastener for an EMI shield

system, and not an improved EMI shield as provided in the present invention. The clip fastener of Bianca et al. is intended as a means for fastening an EMI shield to a printed circuit board, whereas the EMI shielding structure of the present invention is intended to improve the efficiency of EMI shielding.


Therefore, similarly as discussed above with respect to Chen et al., because the EMI shield member of Bianca et al. includes sidewalls that provide support to the EMI shield member, Bianca et al. does not disclose an EMI shielding system that includes an EMI shield member that has a substantially flat shape and that does not include sidewalls along its own perimeter, as recited in independent claim 1 of the present invention. In addition, because the sidewalls of Bianca et al. provide support to the EMI shield member, Bianca et al. does not disclose a contact protuberance that supports the EMI shield member, as recited in independent claim 1. Therefore, Applicant submits that independent claim 1 is not anticipated by Bianca et al. for at least this reason.

Furthermore, as amended, each of independent claims 3, 10, 12, 15, and 18 recites the feature that the EMI shielding structure includes an EMI shield member that has a substantially flat shape and that does not include sidewalls along its own perimeter, unlike the EMI shield member of Chen et al. and unlike the EMI shield member of Bianca et al. In addition, each of independent claims 3, 10, 12, 15, and 18 recites the feature that the contact protuberance supports the EMI shield member. Therefore, Applicant submits that each of independent claims 3, 10, 12, 15, and 18 is not anticipated by either of Chen et al. or Bianca et al. for the same reasons as discussed above with respect to independent claim 1.

Accordingly, it is respectfully submitted that each of independent claims 1, 3, 10, 12, 15, and 18 is allowable over the cited references. Furthermore, each of claims 2, 4-9, 11, 13, 14, 16, and 17 depends from one of independent claims 1, 3, 10, 12, 15, and 18, and is therefore allowable over the cited references for at least the reasons discussed above with respect to claims 1, 3, 10, 12, 15, and 18. Reconsideration and withdrawal of these grounds of rejection are respectfully requested.

All of the rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance, and a notice to that effect is earnestly solicited. Should the Examiner have any questions regarding this response or the application in general, the Examiner is urged to contact the undersigned at (212) 940-8800.

Respectfully submitted,  
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